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OFFICE OF THE CHIEF COUNSEL RULES DOCKET

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Subject: 180-day repack cycle.....

Sir or Madam,

For years, there has been considerable debate regarding changing the current 120-repack cycle for parachutes to a 180-day repack cycle.

It is my opinion as a Master Parachute Repairman that either cycle offers improved reliability.

The 120-day cycle was considered prudent for 1950's technology, but with the advancement of new and better fabrics, better design and construction, etc., a 180-day "repack" cycle will suffice.

However, a majority of skydivers abuse there equipment. It is exposed to dirt, petroleums, temperature extremes, sunlight, and high humidity. Additionally, new equipment designs require more precision and skill to maintain (i.e. pack the parachute and close the container properly so the enclosed parachute is protected).

Therefore, I would support the adoption of a 180-day repack cycle ONLY if a mandatory 90-day VISUAL INSPECTION was performed. With the 90-day visual inspection, minor "cosmetic" corrections could be made, in addition to maintenance of enclosed emergency electronic components. Additionally, Tandem parachute systems would benefit from the 90-day visual inspection as the majority of wear of tear does not involve the certificated system and since these systems are the workhorse of many sport parachute operations, safety and preventive maintenance would be improved.

Best regards,

Mark Vojtko Master Rigger

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